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April 4, 2012

Chair Ravel and Commissioners Eskovitz,  
Garrett, Montgomery, and Rotunda  
Fair Political Practices Commission  
428 J Street, Suite 600  
Sacramento, CA 95814

**RE: Agenda Item 17: AB 1881 (Donnelly) – Filing of Independent Expenditures – OPPOSE**

Dear Chair Ravel and Commissioners,

On behalf of California Common Cause and our 400,000 national members, we urge you to oppose Assembly Bill 1881.

AB 1881 will allow non-candidate committees to refrain from disclosing the name and city of a donor who made a contribution of less than \$5,000 on their publicly accessible campaign statements.

Unfortunately, AB 1881 will decrease the current disclosure requirements in our elections and disable decades of voter-approved transparency. We believe disclosure requirements are necessary to properly educate voters about who is funding election campaigns. Voters commonly consider the source of campaign funds as well as the policy implications when casting their vote.

California Common Cause believes campaign disclosures need to give *more* information to voters, not less. This bill is the wrong prescription for California's campaign finance system. For these reasons, we urge you to adhere to the staff's recommendation and oppose this bill.

Please contact me at [pung@commoncause.org](mailto:pung@commoncause.org) or (916) 520-4070 if you have any questions.

Sincerely,

Phillip Ung  
Policy Advocate



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**RE:Agenda Item 17: AB 2162 (Portantino) –Economic Interest Disclosure —Support**

Dear Chair Ravel and Commissioners,

On behalf of California Common Cause and our 400,000 national members, we urge you to support Assembly Bill 2162, which will increase the number of value ranges in disclosure statements for investment, interests, and income.

AB 2162, changes the existing ranges of values to a comprehensive list with larger value ranges. These changes extend the range for the fair market value of investments or interest in real property from the existing \$1,000,000 cap to \$10,000,000. AB 2162 will also extend the range for income from the existing \$100,000 cap to \$10,000,000.

These new ranges will increase disclosure and allow for more accurate interpretations of where conflicts of interest may occur. A person's interest on any given issue may stem from a personal desire to benefit oneself. Therefore, any increase disclosure that results from AB 2162 will help ensure public decisions are authentic and without financial bias. These proposed changes would require more detailed disclosures, but are not nearly as strict as required of Congress. Attached is Table I which shows the disclosure requirements for Congress compared to the proposed changes in AB 2162. The Commission will see in Table I that federal elected officials are required to disclose far more information than AB 2162 proposes. We are currently working with the author's office on possible amendments which will codify the federal requirements.

For these reasons, California Common Cause urges you to support this legislation.

Sincerely,

Phillip Ung  
Policy Advocate

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**TABLE I  
 CONGRESSIONAL VS AB 2162 DISCLOSURE**

<b>US House of Representatives</b>	<b>US Senate</b>	<b>Proposed in AB 2162</b>
<b>Value Asset</b>	<b>Value Asset</b>	<b>Investment</b>
\$1-\$1,000	None (For less than \$1,001)	At least \$2,000-\$25,000
\$1,001-\$15,000	\$1,001-\$15,000	\$25,000-\$100,000
\$15,001-\$50,000	\$15,001-\$50,000	\$100,000-\$250,000
\$50,001-\$100,000	\$50,001-\$100,000	\$250,000-\$500,000
\$100,001-\$250,000	\$100,001-\$250,000	\$500,000-\$1,000,000
\$250,001-\$500,000	\$250,001-\$500,000	\$1,000,000-\$5,000,000
\$500,001-\$1,000,000	\$500,001-\$1,000,000	\$5,000,000-\$10,000,000
\$1,000,001-\$5,000,000	\$1,000,001-\$5,000,000	\$10,000,000 or more
\$5,000,001-\$25,000,000	\$5,000,001-\$25,000,000	
\$25,000,001-\$50,000,000	\$25,000,001-\$50,000,000	
Over \$50,000,000	Over \$50,000,000	
<b>Income</b>	<b>Income</b>	<b>Income</b>
\$1-\$200	None (For less than \$201)	\$500-\$1,000
\$201-\$1,000	\$201-\$1,000	\$1,000-\$10,000
\$1,001-\$2,500	\$1,001-\$2,500	\$10,000-\$25,000
\$2,501-\$5,000	\$2,501-\$5,000	\$25,000-\$100,000
\$5,001-\$15,000	\$5,001-\$15,000	\$100,000-\$250,000
\$15,001-\$50,000	\$15,001-\$50,000	\$250,000-\$500,000
\$50,001-\$100,000	\$50,001-\$100,000	\$500,000-\$1,000,000
\$100,001-\$1,000,000	\$100,001-\$1,000,000	\$1,000,000-\$5,000,000
\$1,000,001-\$5,000,000	\$1,000,001-\$5,000,000	\$5,000,000-\$10,000,000
Over \$5,000,000	Over \$5,000,000	\$10,000,000 or more



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**RE: Agenda Item 17: AB 2239 (Norby)—Political Reform Act of 1974—OPPOSE**

Dear Chair Ravel and Commissioners,

On behalf of California Common Cause and our 400,000 national members, we strongly urge you to oppose Assembly Bill 2239, which proposes to remove campaign contribution limits.

AB 2239 proposes amending the Political Reform Act of 1974 to no longer include voter-approved campaign contribution limits that affect how much a candidate for an elected office can receive and how much a committee can contribute. Also under AB 2239, candidates and committees would no longer be required to file specified campaign reports.

Eliminating campaign contribution limits would go directly against the will of California voters and is a dangerous proposal for democracy, and does not further the purposes of the Act. If AB 2239 is enacted, money will pour into candidate committees at greater amounts than we have ever seen in this state. Elected officeholders may be swayed to vote on behalf of those who make large contributions not on the merits of public policy. Contrary to the author's claims, removing contribution limits to candidates will *not* eliminate the activities of independent expenditures. We strongly disagree with the claim that you can solve the IE problem by replacing it with another problem. We agree with the staff analysis that the increased disclosure requirements are well-intended, but attaching it to the removal of contribution limits is unacceptable. We strongly urge the Commission to either oppose or take an "oppose unless amended" position and ask the author to strike the portion of the bill that eliminates contribution limits.

For these reasons, Common Cause opposes AB 2239 Please contact me at [pung@commoncause.org](mailto:pung@commoncause.org) or (916) 520-4070 if you have any questions.

Sincerely,

Phillip Ung  
Policy Advocate

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**RE: Agenda Item 17: AB 1509 (Hayashi) – Internet Disclosure of Local Statement of Economic Interests– SUPPORT**

Dear Chair Ravel and Commissioners,

On behalf of California Common Cause and our 400,000 national members, please accept this letter urging you to support Assembly Bill 1509, a bill that would require public disclosure of local officials' Statement of Economic Interests on city and county Internet Websites.

The Political Reform Act requires all public officials to file an annual Statement of Economic Interests (SEIs) which lists investments, income, and other economic assets to prevent conflicts of interests from arising when officials make decisions on behalf of the public. Statements of Economic Interests are available through public records requests to the Fair Political Practices Commission. However, the FPPC has recently begun proactively posting State elected officials' SEIs to save time and money from processing public requests. AB 1509 would require local governments follow the FPPC's example and proactively post SEIs for public scrutiny saving the voter's resources while increasing transparency and accountability.

SEIs have been essential to the FPPC and political watchdogs like Common Cause to identify or prevent officials from making decisions which are based on their personal economic interests and not on the needs of Californians. These economic interests can and do affect the policy choices of the public official. California voters deserve to have honest information regarding the economic interests of public decision makers to prevent government abuse and corruption. We urge you to use the staff's recommendation and support this legislation.

Sincerely,

Phillip Ung  
Policy Advocate

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**RE: Agenda Item 17: AB 1648 (Brownley) – CA DISCLOSE Act – SUPPORT**

Dear Chair Ravel and Commissioners,

On behalf of California Common Cause and our 400,000 national members, please accept this letter urging you to support Assembly Bill 1648, the California DISCLOSE Act.

AB 1648 would provide essential reforms to California’s campaign finance disclosure laws and increase transparency in our elections. This bill would identify the top contributors of ballot measure campaigns in all television ads, radio ads, print and mass mailing ads, and websites; and would require other contributors to be listed on Secretary of State’s website.

California Common Cause strongly supports these disclosure provisions because in every election cycle special interests flood voter’s airwaves and mailboxes with messages from political action committees and ballot measure committees. These PACs and other committees consistently employ deceitful names and monikers in an attempt to fool voters. California voters deserve to have honest information about who is funding political campaigns. This information is critical to making informed decisions.

For these reasons, California Common Cause urges you to support AB 1648 to bring more transparency to California’s elections.

Please contact me at [pung@commoncause.org](mailto:pung@commoncause.org) or (916) 520-4070 if you have any questions.

Sincerely,

Phillip Ung  
Policy Advocate

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**RE: Agenda Item 17: SB 31 (Correa)—Post-government Employment Restrictions—SUPPORT**

Dear Chair Ravel and Commissioners

On behalf of California Common Cause and our 400,000 national members, please accept this letter urging you to support Senate Bill 31 which would extend post-government restrictions to the local level.

Senate Bill 31 will extend post-government employment restrictions to public officials that serve as members with decision making authority of local governing boards and commissions. SB 31 includes an exemption for individuals who are members of solely advisory local governing boards or commissions.

This legislation will further prevent the revolving door that threatens the integrity of public decisions. Local agencies have an enormous influence on the everyday lives of voters. The inclusion of local level board members to these restrictions will assure that decisions made by public officials are unbiased and not as a result of lobbying by former agency officials.

California Common Cause urges you to join us in support of this important legislation.

Please contact me at [pung@commoncause.org](mailto:pung@commoncause.org) or (916) 520-4070 if you have any questions.

Sincerely,

Phillip Ung  
Policy Advocate





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**RE: Agenda Item 17: Senate Bill 1001 – Lobbyist Registration Fee Adjustment (SPONSOR)**

Dear Chair Ravel and Commissioners,

On behalf of California Common Cause and our 400,000 national members, we are proud to be the sponsor of Senate Bill 1001, which would provide for a common sense increase in California’s lobbying registration fees which have not been adjusted since the passage of the Political Reform Act of 1974. We urge the Commission to support this legislation.

Senate Bill 1001 would make two simple changes to the Political Reform Act: 1) increase lobbying registration fees from \$25 to \$50 per year; 2) authorize the Fair Political Practices Commission to make biennial cost-of-living-adjustments based on changes to the Consumer Price Index. These updates are essential to make sure the Political Reform Act remains effective in our current day.

With an increase to \$50 per year, California’s lobbying registration fees will remain one of the lowest in the country. And despite the public’s disgust with special interest influence on our government, California continues to have one of the highest numbers of state registered lobbyists. This fee will help pay for the maintenance of California’s campaign and lobbying disclosure database, CAL-ACCESS, which remains in poor condition with outdated technology. CAL-ACCESS was unavailable for nearly a month in 2011 because of a massive system failure. The CAL-ACCESS crash left campaign committees, lobbying interests, media, and political watchdogs unable to obtain important documents which would have shined a light on money and influence in our political system.

We urge you to support this legislation that will update California lobbying registration fees and support the state’s online disclosure database.

Sincerely,

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Policy Advocate

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